

On May 22, 2000, the United States Environmental Protection Agency (EPA), Region, and T.T. Coatings, located in Westwego, Louisiana, filed a Consent Agreement and Final Order (CAFO) resolving violations alleged in a March 22, 2000 Administrative Complaint. The Complaint charged T.T. Coatings, a barge cleaning and gas freeing facility, with violating provisions of the Resource Conservation and Recovery Act (RCRA) discovered during a June 8, 1999, EPA compliance evaluation inspection (CEI). During the CEI the following violations were noted:



- < operating a hazardous waste storage area without a permit in violation of the Louisiana Administrative Code (LAC) 33:V.303 [40 Code of Federal Regulations (C.F.R.) § 270.1] by failing to meet the requirements of LAC 33:V.1101 [40 C.F.R. § 262.34].

T.T. Coatings violated regulations by failing to properly label drums as hazardous waste and failing to have labels with start accumulation dates on them.



- < failure to meet used oil requirements in violation of LAC 33:V.4049 (40 C.F.R. § 279.54)

Again, failure to label as used oil storage and process tanks caused this violation.

As of April 17, 2000, documents were received by EPA verifying the facility's compliance with the sited regulations.

The CAFO of May 22, requires the facility to

properly label hazardous waste drums and used oil tanks, to comply with RCRA regulations regarding 90 day storage requirements, and to pay a civil penalty in the amount of \$24,970 in quarterly installments over a two-year period.

## SITE BACKGROUND SUMMARY

T.T. Coatings operates as a large quantity generator (LQG) of hazardous waste and a used oil broker. It occupies about five acres with approximately 1200 feet of river frontage. The majority of the hazardous waste generated is from cleaning the vapor destruction unit. Another source of hazardous waste is from the barges containing benzene that are cleaned on-site. The facility also generates used oil from the vacuum pump on the vapor destruction unit. T.T. Coatings processes the used oil in tanks and sells it to refineries.



**For more information regarding this facility or the above described case, please contact:**

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